

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

APPLETON PAPERS, INC. and)	
NCR CORPORATION,)	
)	
Plaintiffs,)	
)	
v.)	No. 08-CV-00016-WCG
)	
GEORGE A. WHITING PAPER)	
COMPANY, et al.,)	
)	
Defendants.)	

NOTICE OF VIDEOTAPED DEPOSITION DIRECTED TO PLAINTIFF NCR
CORPORATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(B)(6)

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PLEASE TAKE NOTICE that Defendants Georgia-Pacific Products LP (f/k/a/ Fort James Operating Company), Fort James Corporation and Georgia-Pacific LLC (collectively, “Georgia-Pacific”), by and through its undersigned counsel, will take the deposition of Plaintiff NCR Corporation (“NCR”) beginning at 9:00 a.m. Central Standard Time on August 28, 2009, or other mutually agreed upon date, at Reinhart Boerner Van Dueren s.c., 1000 North Water

Street, Milwaukee, WI 53201-2965. The deposition will take place before a person duly authorized to administer oaths, and will be recorded stenographically and by videotape.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), NCR shall designate one or more officers, directors, managing agents, or other persons to appear and testify on its behalf concerning the matters set forth below. The individuals designated shall testify as to matters known or reasonably available to NCR. The time frame for the matter to be inquired into shall begin at the time NCR began to develop the process for making carbonless copy paper (estimated to have been in the beginning of the 1950s), through December 31, 1979.

A. DEFINITIONS

1. As used herein, the terms “NCR,” shall mean and include National Cash Register Company, NCR Corporation, any and all current and former subsidiaries, affiliates, divisions, partnerships, officers, directors, employees, agents, attorneys, consultants, investigators or representatives thereof, or any other person or entity acting on the behalf thereof or under the direction or control thereof.

2. As used herein, the term “Appleton” or “API” shall mean and include Appleton Coated Paper Company, Appleton Papers, Inc., Appleton Papers Inc., any and all current and former subsidiaries, affiliates, divisions, partnerships, officers, directors, employees, agents, attorneys, consultants, investigators or representatives thereof, or any other person or entity acting on the behalf thereof or under the direction or control thereof.

3. As used herein, the term “Monsanto” shall mean and include Solutia Inc., including any and all current and former subsidiaries, affiliates, divisions and partnerships of the former Monsanto Company (now known as Pharmacia Corporation, a 100% owned subsidiary of Pfizer, Inc.).

4. As used herein, the term “BAT” shall mean and include British American Tobacco PLC, British American Tobacco Ltd., B.A.T. Industries, PLC, any and all current and former subsidiaries, affiliates, divisions, partnerships, officers, directors, employees, agents, attorneys, consultants, investigators or representatives thereof, or any other person or entity acting on the behalf thereof or under the direction or control thereof.

5. As used herein, the term “Mead” shall mean and include The Mead Corporation, Mead Paper Company, any and all current and former subsidiaries, affiliates, divisions, partnerships, officers, directors, employees, agents, attorneys, consultants, investigators or representatives thereof, or any other person or entity acting on the behalf thereof or under the direction or control thereof.

6. As used herein, the term “Mitsubishi” shall mean and include Mitsubishi Paper Mills Ltd., any and all current and former subsidiaries, affiliates, divisions, partnerships, officers, directors, employees, agents, attorneys, consultants, investigators or representatives thereof, or any other person or entity acting on the behalf thereof or under the direction or control thereof.

7. As used herein, the term “Jujo” shall mean and include Jujo Paper Company, any and all current and former subsidiaries, affiliates, divisions, partnerships, officers, directors, employees, agents, attorneys, consultants, investigators or representatives thereof, or any other person or entity acting on the behalf thereof or under the direction or control thereof.

8. As used herein, the term “Wiggins” and/or “Wiggins Teape” shall mean and include the Wiggins Teape Group Ltd., a specialty paper manufacturer from the United Kingdom, any and all former subsidiaries, affiliates, divisions and partnerships thereof, including Wiggins Teape Research & Development Ltd., Wiggins Teape (Belgium) S.A. and Wiggins Teape Ltd., any and all successors-in-interest including Wiggins Teape Appleton plc, Arjo

Wiggins Appleton plc, Arjowiggins SAS and Appleton Coated LLC, and any of its officers, directors, employees, agents, representatives, attorneys, consultants and investigators, as well as any other person or entity acting on its behalf or under its direction or control.

9. As used herein, the terms “PCB” shall mean the entire group of industrial compounds produced by the chlorination of biphenyl, including the entire line of Aroclor® products marketed, manufactured, sold, or distributed at any time by Solutia f/k/a Monsanto.

10. As used herein, the term “NCR Paper” shall mean the carbonless copy paper produced by NCR, or for NCR by any other company or entity, including, but not limited to, broke, trim, and other scrap paper, produced during the production of carbonless copy paper by NCR, API, or their licensees, which was sold or otherwise provided (directly or indirectly) to recycling paper mills for use as fiber furnish in paper making.

11. As used herein, the term “carbonless copy paper” or “CCP” shall mean and include paper manufactured as an alternative to traditional carbon paper, using any type of PCB as an emulsion or transfer agent. For purposes of these Requests, “carbonless copy paper” or “CCP” includes any and all paper designed, manufactured, sold and/or distributed by NCR, but only to the extent the resulting paper contained or was manufactured with PCBs. The term “carbonless copy paper” or “CCP” therefore does not include any paper manufactured using non-PCB emulsions or transfer agents. The term “carbonless copy paper” or “CCP” also means and includes that paper sometimes referred to as “carbonless carbon paper.”

12. As used herein, the term “Recovered Fiber” shall mean any and all pre- and post-consumer paper materials that were collected and sold as recyclable paper materials and were used by paper mills as the furnish or raw materials to produce paper or paperboard products.

13. As used herein, the term “wastewater” shall mean any liquid waste stream resulting from the pulping, deinking, bleaching, and/or papermaking operations or processes that is not reused in the papermaking operation or process.

14. As used herein, the term “Trade Industry Organizations” shall mean any and all paper industry research, advocacy and trade organizations that were engaged in activities related in any way to PCBs between 1950 and 1979, including but not limited to the American Paper Institute, Wisconsin Paper Counsel, the Boxboard Research and Development Association, the Technical Association of the Pulp and Paper Industry, and the Grocery Manufacturers of America.

B. TOPICS

1. The efforts and searches made by NCR to assemble the documents responsive to Georgia-Pacific’s Second Set of Interrogatories, Requests for the Production of Documents, and Requests for Admission to Plaintiff NCR Corporation, dated July 28, 2009, as well as the location of these documents as they are kept in the ordinary course of business, and the document retention policies applicable to these documents.

2. When and how NCR first learned that the production of CCP capsules, the production of CCP emulsion, the production of CCP, or the recycling of CCP, including “waste,” “broke,” “trim,” “scrap,” cut-off” or “off-cuts” from CCP worldwide could result in the discharge of PCBs to a waterbody or wastewater treatment facility thereby risking environmental damage, including actual or potential adverse impacts to the environment, human health or animal health.

3. What, if any, action was taken by NCR upon acquiring knowledge that the production of CCP capsules, the production of CCP emulsion, the production of CCP, or

the recycling of CCP, including “waste,” “broke,” “trim,” “scrap,” cut-off” or “off-cuts” from CCP worldwide could result in the discharge of PCBs to a waterbody or wastewater treatment facility thereby risking environmental damage, including actual or potential adverse impacts to the environment, human health or animal health.

4. What if any steps were taken by NCR to reduce the release of PCBs from the production of CCP capsules, the production of CCP emulsion, the production of CCP, or the recycling of CCP, including “waste,” “broke,” “trim,” “scrap,” cut-off” or “off-cuts” from CCP worldwide, and when those steps were taken.

5. When and how NCR first learned that PCBs could cause environmental damage, including actual or potential adverse impacts to the environment, human health or animal health.

6. What, if any, action was taken by NCR upon acquiring knowledge that PCBs could cause environmental damage, including actual or potential adverse impacts to the environment, human health or animal health.

7. When and how NCR first learned that recycling NCR Paper could result in the discharge of PCBs to a waterbody or a wastewater treatment facility.

8. What, if any, action was taken by NCR upon acquiring knowledge that recycling NCR Paper could result in the discharge of PCBs to a waterbody or a wastewater treatment facility.

9. The following activities taken by NCR between 1950 and 1979, including but not limited to the departments, units, or other subsets of NCR responsible for each activity, and the employees who managed and/or were assigned to those department, units, or other subsets of NCR:

- a. Research and development, including the development of NCR Paper and the use of PCBs in NCR Paper;
- b. Evaluation of PCBs during the time NCR used PCBs in its Paper;
- c. The purchasing, receiving, screening, testing, sampling, and/or returning of any PCBs used by NCR;
- d. NCR's decision to stop using PCBs in NCR Paper;
- e. Public relations related to PCBs;
- f. Sales of NCR Paper;
- g. Product safety or liability associated with NCR Paper;
- h. Customer relations, including any returns of NCR Paper to NCR, or returns of any product used for the production of NCR paper, including PCBs, to the seller of such products;
- i. Capsule manufacturing operations, including but not limited to the types of capsules manufactured, the source, use, and/or reuse of water in the capsule manufacturing operations, and the discharge/disposal of water used or reused in the capsule manufacturing operations;
- j. Monitoring, measuring, treating, and/or sampling of wastewater discharged by NCR, including but not limited to the discharge from the Portage, Wisconsin facility and the Dayton, Ohio facility;
- k. Collecting, treating, testing, sampling and/or disposal of sludge or other solid waste generated as the result of capsule manufacturing

at the Portage, Wisconsin facility and NCR paper development at the Dayton, Ohio facilities.

10. Any sampling or studies conducted by or on behalf of NCR or known to NCR relating to PCBs, including but not limited to sampling of PCB-containing capsules, PCB-containing emulsion, Recovered Fiber, finished paper, wastewater and/or sludge.
11. All uses of PCBs by NCR.
12. NCR's dealings with any Local, State, Federal, or International governmental agency regarding wastewater discharges, including but not limited to all relevant permits, orders, or notices of violation issued to NCR.
13. Any enforcement actions against NCR concerning PCBs.
14. NCR's membership, affiliation, or participation in any Trade Industry Organizations between 1950 and 1979.
15. NCR's actions with regard to government regulation of PCBs.
16. Communications with Local, State, Federal, or International governments, trade groups, Appleton, Monsanto, Wiggins Teape, Mead, BAT, Jujo, Mistubishi, and all current and former subsidiaries, affiliates, division and partnerships thereof concerning any matters listed in subparagraphs 9(a)-(k).
17. Communications with any and all of NCR's customers concerning any matters listed in subparagraphs 9(a)-(k).

Pursuant to Fed. R. Civ. P. 34, the designee(s) shall produce for inspection and copying all document relating to these topics to the extent they have not been produced by any party to date in this litigation.

All parties are invited to attend and to participate if so desired.

Dated: July 29, 2009

Georgia-Pacific Consumer Products
LP (f/k/a Fort James Operating
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and Georgia-Pacific LLC
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CERTIFICATE OF SERVICE

I hereby certify that, on **July 29, 2009**, I caused a true and correct copy of the foregoing **NOTICE OF VIDEOTAPED DEPOSITION DIRECTED TO PLAINTIFF NCR CORPORATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(B)(6)** to be served on the following counsel via electronic mail.

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